

Knittel, Janette

From: Tasya Gray <ngray@dofnw.com>
Sent: Thursday, September 10, 2020 9:26 AM
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Subject: Former Rhone Poulenc Site August Monthly Progress Report
Attachments: 20200910_Monthly Progress Report_August 2020.pdf

Hello Janette,
Please find the August monthly progress report for the Former Rhone Poulenc Site attached.
Thank you,
Tasya

Tasya Gray, LG

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September 10, 2020

Ms. Janette Knittel
EPA Region 10/AWT-150
EPA Project Coordinator
1200 Sixth Avenue, 15-D13
Seattle, WA 98101

Subject: Monthly Progress Report – August 2020

Former Rhone-Poulenc Facility
9229 East Marginal Way South
Tukwila, WA 98108

Dalton, Olmsted, & Fuglevand, Inc. (DOF) prepared this progress report on behalf of the Respondents. This report summarizes pertinent, implemented, and planned Resource Conservation and Recovery Act corrective action activities at the former Rhone-Poulenc, Inc., facility located on East Marginal Way South in Tukwila, Washington. This document is being transmitted to fulfill the monthly progress reporting requirement in the U.S. Environmental Protection Agency (EPA) Region 10 Administrative Order on Consent No. 1091-11-20-3008(h) (the Order).

ACTIVITIES COMPLETED OR IN PROGRESS FOR THIS REPORTING PERIOD

Progress Report

The July 2020 monthly progress report required under the Order was delivered to EPA on July 10, 2020.

Interim and Corrective Measures

This section summarizes key activities performed related to implementation of the hydraulic control interim measure (HCIM).

Performance Monitoring

No performance monitoring activities occurred during August. Semi-annual performance monitoring sampling (Round 89) and the annual specific capacity testing of the extraction wells is scheduled to occur the week of September 21, 2020 and may carry over to the following week.

Hydraulic Control

The pre-treatment system operated under automatic control from August 1 to August 31, 2020. Water level data was downloaded from both the data recorder and the programmable logic controller (PLC) on September 1, 2020.

The differential between 72-hour averaged water levels in wells DM-8 and MW-49 was maintained at more than 1-foot from August 1st to August 31st and was approximately 1.85 feet at the end of August. We will continue to report flow using the totalized flow from the individual extractions wells due to a slight undercount of flow observed when relying on the effluent flow meter, as previously reported.

Maintenance

Bag filters were changed on August 11, 2020 due to pressure observed between the extraction wells and the bag filters. Changing of the bag filters decreased the observed pressure and increased extraction flow rates.

One of two new gates to the west parcel (on the east side) has been installed. A second gate will be installed to allow for automation of the gates, given the new tenant uses described in the previous monthly report.

Corrective Measures Study

The Agency Draft Corrective Measures Study (CMS) Work Plan was delivered to EPA on September 2, 2014.

The CO₂ Neutralization Pilot Study results report was submitted to EPA on May 15, 2020.

Other Activities

Data from sediment sampling this summer within the boundaries of the former Rhone-Poulenc RCRA Site (tide flat area) as part of the Lower Duwamish Waterway Superfund Site Pre-Design Studies is anticipated to be available in late 2020.

A request for variance in reporting schedule and submittal format was provided to EPA on August 17, 2020. The request is currently under review by EPA.

Activities Planned for the Next Reporting Period

Various activities associated with the facility will continue during the next reporting period. During September 2020, the Respondents plan to:

- Continue regularly scheduled operations and maintenance activities associated with the HCIM;
- Collect the third quarter King County discharge permit required samples for reporting in October.
- Perform the semi-annual performance groundwater sampling event and associated HCIM annual inspections.
- Continue discussions with EPA regarding next steps on the CMS Work Plan.

On behalf of the Respondents, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designated to evaluate the information submitted. I certify that the information contained in or accompanying this report, Monthly Progress Report – August 2020, is true, accurate, and complete. As to those portions of the report for which I cannot personally verify accuracy, I certify under penalty of law that this report and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who may manage the system or those directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

By: Natasya AD Gray
Natasya Gray, Project Coordinator

Date: September 10, 2020

cc: Jennifer MacDonald, EPA
Li Ma, Ecology
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Paul Linskey, Rhodia